



School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

Transmitted via Electronic Mail

Ms. Kyla L. Townsend-McIntyre
U.S. Environmental Protection Agency, Region III
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Self Disclosure Agreement - AHERA
Morris Elementary School Annex ULCS #2391

Dear Ms. Townsend-McIntyre

As part of the School District of Philadelphia agreement, effective March 9, 2007 and amended January 18, 2008 with the United States Environmental Protection Agency (EPA), this letter is intended to transmit and certify the Corrective Action Plan (CAP) for the Morris Elementary School Annex.

This Disclosure Report was written in accordance with the above noted agreement and the "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy).

As the Responsible Official, I hereby certify that the attached report entitled *CAP – Morris Elementary School Annex ULCS #2391* submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

If you have any questions or comments please feel free to contact me or Ms. Elizabeth Gutman, Esq.

Sincerely,

A handwritten signature in cursive script, reading "Francine Locke".

Francine Locke, MS
Director, Environmental Management & Services

Attachment 1 – *CAP – Morris Elementary School Annex ULCS #2391*

SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN

Updated as of: May 9, 2008

Facility Name: Morris Annex Elementary School #2391
Facility Address: 1241 N. Taney Street, Philadelphia, PA 19121
Date of Audit: 3/31/08
Date CAP due to EPA: 5/30/08

Finding Number	Regulatory Citation	Finding	Corrective Action	Corrective Action Status	Preventative Measure	Preventative Measures Status (include date when closed)	Extension Filed (Y/N)	Exhibit Reference	Approximate Cost to Close Finding	Potential Reduction of Pollutants *INCLUDE AMT OF OIL
ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E										
1	(40 CFR § 763.93(a)(2))	An initial management plan was not found. This location was initially obtained in 2000. The regulations require the LEA to complete an Asbestos Management Plan prior to use as a school building. For buildings obtained after October 12, 1988 the LEA must submit the plan to the Pennsylvania Department of Education. The latest reinspection report is dated October 2006.	Submit a copy of the latest inspection to the Pennsylvania Department of Education.	Closed 5/9/08- A copy of the latest reinspection report was submitted to the following: Commonwealth of Pennsylvania DEP Bureau of Air Quality Attn: Randy Koppenhaver 400 Market Street P.O. Box 8468 Harrisburg, PA 17101-8468	Develop a written plan that will ensure leased locations are inspected prior to its use as a school building. Maintain accurate up-to-date information regarding buildings that are planned for leasing.	In Progress	N	1	\$400	Recordkeeping violation
2	(40 CFR § 763.85(b)(1)(vii))	The regulations require that the 3 Year Reinspections records be updated within 30 days of the inspection. The most recent Reinspection Report is dated October 2006 and was available for review at the central file and the school building; however it was recently printed/distributed and was not completed within the required 30 day time frame from the inspection date in October 2006.	The 3 Year Reinspection records must be updated within 30 days of the actual inspection. This is a historical finding.	Historical finding. Corrective Action can not be completed.	A compliance calender should be established and implemented so that the 30 day update can be tracked by the personnel in the central office for the next 3 Year Reinspection in 2009.	In Progress - A draft compliance calendar was created by URS for the 30 day tracking of the inspections and is currently being reviewed by the School District.	N	2	\$400	Recordkeeping violation
3	40 CFR § 763.94)(d)	The school is required to complete 6 Month Periodic Surveillance Inspections. Varied data gaps exist between 6 Month Periodic Surveillance Inspections 2002-2007, ranging from 1-9 months.	The school must complete Periodic Surveillance Inspections every 6 months. This is a historical finding as the school can not complete past missed inspections	Historical finding. Corrective Action can not be completed.	A compliance calender should be established and implemented to ensure the timely completion of the 6 Month Periodic Surveillance Inspections.	In Progress - A draft compliance calendar was created by URS tracking the 6 Month Inspections and is currently being reviewed by the School District.	N	3	\$400	Recordkeeping violation



School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

May 7, 2008

Ms. Ruth King
Morris Annex Elementary School
1241 Taney Street
Philadelphia, PA 19121

Re: Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit
Documentation Related to Corrective Action Plan

Dear Ms. King:

Following the AHERA Environmental Compliance Audit conducted at the Morris Annex Elementary School on March 31, 2008 the attached documents have been prepared for inclusion into the AHERA environmental management plan at your school and at the Environmental Library located at 440 N. Broad Street.

The following documents were prepared for the Morris Annex Elementary School and must be kept with the AHERA environmental management plan records:

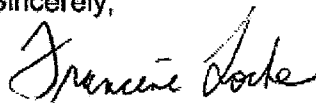
Exhibit 4 – The 2000 Reinspection Report not found at the school during the audit

^{SEC}
School Principal:
Print Name: CAROL MOORE
Sign Name: Carol Moore
Date: 5/9/08

Witnessed by:
Title: URS
Print Name: Brian Joseph
Sign Name: Brian Joseph
Date: _____

If you have any questions or comments, please feel free to contact Francine Locke at 215-400-4750 or Jerry Junod at 215 400-6738.

Sincerely,

A handwritten signature in cursive script, appearing to read "Francine Locke".

Francine Locke, MS
Director, Environmental Management & Services

School District of Philadelphia
Asbestos Hazard Emergency Response Act (AHERA)
Compliance Audit

Principal Interview Form


The School District of Philadelphia (School District) and the U.S. Environmental Protection Agency, Region III (EPA) entered into a Self-Audit/Self Disclosure Agreement. The purpose of the agreement is to gauge the School District's compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for your school/ facility.

The School District obtained the services of URS Corporation (URS) to conduct the AHERA environmental compliance audit. The audit will focus on the compliance of general information, inspections and reinspections, response actions, operations and maintenance, periodic surveillance, and notifications. This document acknowledges that all environmental documents relevant to the building asbestos management plan have been made available to URS at the time of the audit.

School/ Facility:	Morris Annex Elementary 2391
Address:	1241 N. Taney Street
Date of Audit:	3/31/08

School Principal:

Print Name: Ruth King

Sign Name: 

Date: 3/31/08

9158 6EES 9000 0922 E007
7003 2260 0006 5334 8576

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com ®	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

5/9/08
Postmark
Here

Sent To <i>Randy Keppen harer DEP Bureau of</i> Street, Apt. No., or PO Box No. <i>PO Box 8468</i> City, State ZIP+4 <i>Harrisburg PA 17101-8468</i>	<i>Air Quality</i> <i>400 Market St</i>
---	--

PS Form 3800, June 2002 See Reverse for Instructions

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

PS Form 3800, June 2002 (Reverse)